

EXHIBIT D

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June 14, 2018

Mr. David Gross
7248 Ballantrae Court
Boca Raton, Florida 33496

Re: Picard v. David Gross and Irma Gross, individually and as joint tenants, Adv. Pro. No. 10-04467 (Bankr. S.D.N.Y.) (SMB)

Dear Mr. Gross:

This letter follows our discussion of June 12, 2018.

Pursuant to that discussion, enclosed is the Trustee's Hardship Application and Financial Disclosure Form. As I explained on our call, the Hardship Application is used to determine whether a defendant merits a reduced settlement amount or a dismissal of the Trustee's case based on financial conditions. Please complete the application at your earliest convenience and send it back to us with supporting documentation.

Once we receive the completed documents, the Trustee's Hardship Committee will review and respond within approximately two weeks.

Please feel free to call me with any questions.

Sincerely,



Tatiana Markel

Enclosure

HARDSHIP APPLICATION AND FINANCIAL DISCLOSURE FORM

Please answer the following questions to aid the Trustee in assessing your application in the space provided below (attach additional pages where necessary to give a complete answer).

Section 1: Personal Information

1a Full Name of Applicant and Spouse (if applicable)	1c Home Phone ()	1d Cell Phone ()
1b Address (Street, City, State, ZIP Code) (County of Residence)	1e Business Phone ()	1f Business Cell Phone ()
	1g Date of Birth:	
	2b -Name, Age, and Relationship of dependent(s)	

Section 2: Personal Asset Information for All Individuals**2 Statement of Assets and Liabilities as of ____:****A. Assets:**

List all assets owned by you, your spouse, or any other member of your household, directly or indirectly, and all assets which are subject to your or your spouse's possession, enjoyment, or control, regardless of whether legal title or ownership is held by a relative, trustee, lessor, or any other intermediary with a value of \$5,000 or more, including but not limited to the categories indicated below.

1. Cash _____
 2. Cash Surrender Value of Insurance _____
 3. Accounts Receivable _____
 4. Loans or Notes Receivable _____
 5. Real Estate _____
 6. Estimated value of Household Furnishings and Artwork _____
 7. Automobiles _____
 8. Securities _____
 9. Partnership Interests _____
 10. Net Value of Ownership Interest in Business _____
 11. Pension assets including IRA, 401(k), defined benefit plans and Keough accounts _____
 12. Annuities _____
 13. Other (Itemize) _____
- Total Assets** _____

B. Liabilities:

List all liabilities, including but not limited to the items listed below.

1. Mortgages _____
2. Auto Loans _____
3. Credit Card Debt _____
4. Loans on Insurance Policies _____
5. Installment Loans _____
6. Other Loans or Notes Payable _____
7. Accrued Real Estate Taxes _____
8. Judgments/Settlements Owed _____
9. Other (Itemize): _____
10. _____
11. _____

Total Liabilities

3 In the past 10 years, have any assets been transferred by the individual (If yes, answer the following. If no, skip to 4)			Yes <input type="checkbox"/>	No <input type="checkbox"/>
List Asset	Value at Time of Transfer	Date Transferred (mmddyyyy)	To Whom or Where was it Transferred	
	\$			
	\$			
	\$			
	\$			
	\$			

4 Cash Flow Information

A. Income/Receipts

List all money or other income received from any source on a monthly basis by you, your spouse, or any other member of your household, identifying the source, recipient, and amount. For any income received on a basis other than monthly, convert to a monthly basis for the purpose of this statement.

Total Receipts	\$
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B. Expenses/Disbursements

List all monthly expenditures for whatever purpose for you or your household for the past 12 months, identifying the purpose and the amount, including projected expenses. For any expenditure which varies from month to month, indicate a range of amounts and the average amount on a monthly basis.

Total Expenses/Disbursements	\$
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*If you anticipate unusual expenses in the coming 12 months, please describe them.

Please provide a detailed description of the hardship you are experiencing and include any information not listed above that would aid the Trustee in considering your Hardship Application.

Under penalties of perjury, I declare that I have examined the information given in this statement, and attached hereto, and, to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I have no assets, owned either directly or indirectly, or income of any nature other than as shown in, or attached to, this statement. I understand that any material misstatements or omissions made by me herein or in any attachments hereto may constitute criminal violations, punishable under 18 U.S.C. 1001.

Date

Sworn before me this _____ day of _____, _____.

Notary Public

This Hardship Application and Financial Disclosure Form must be completed and mailed promptly, together with supporting documentation, etc. to:

Irving H. Picard, Esq.,
Trustee for Bernard L. Madoff Investment Securities LLC
Baker & Hostetler, LLP
c/o Hardship Application Processing
45 Rockefeller Center, 11th Floor
New York, NY 10111.